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 MENTOR GRAPHICS CORPORATION

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 ENGINEERING S.A. and EVE-USA, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SYNOPSYS, INC., EMULATION
 VERIFICATION ENGINEERING S.A. AND
 EVE-USA, INC.,

Plaintiffs,

v.

MENTOR GRAPHICS CORPORATION,
 Defendant.

Case No. 3:12-cv-05025-MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER TO FILE PORTIONS OF
 DOCUMENT UNDER SEAL
 PURSUANT TO CIVIL LOCAL RULE
 79-5**

STIPULATION

Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiffs Synopsys, Inc., EVE-USA, Inc. (“EVE-USA”), and Emulation and Verification Engineering, S.A. (“EVE S.A.”) and Defendant Mentor Graphics Corp. (“Mentor Graphics”) jointly submit this stipulation regarding Plaintiffs’ Administrative Motion to File Portions of Documents Under Seal Pursuant to Civil Local Rule 79-5. The parties request that the Court approve the Stipulation and enter the proposed order allowing Plaintiffs to file under seal portions of Plaintiffs’ Answer to Mentor Graphics Corporation’s Counterclaims (“Plaintiffs’ Answer”).

Although counsel for Mentor Graphics Corporation has not reviewed Plaintiffs’ Answer, Plaintiffs have represented that portions of Plaintiffs’ Answer quote from and/or refer to the confidential terms of the same 2006 settlement agreement between EVE-USA, EVE S.A., and Mentor Graphics Corporation that was filed under seal as Exhibit A to Defendant Mentor Graphics Corporation’s Answer to Complaint for Declaratory and Injunctive Relief and Counterclaims. This agreement requires the parties to keep the non-public aspects of the agreement confidential. *See* Exhibit A to Defendant Mentor Graphics Corporation’s Answer to Complaint for Declaratory and Injunctive Relief and Counterclaims. Mentor Graphics agrees that the parties have a duty to maintain the confidentiality of the terms of the 2006 settlement agreement and relies on Plaintiffs’ representations as to the content of Plaintiffs’ Answer for purposes of this stipulation.

NOW, THEREFORE, the Parties hereby STIPULATE and REQUEST the Court to place portions of Plaintiffs' Answer to Mentor Graphics Corporation's Counterclaims under seal in the files and records of the Court until further order of the Court.¹

Dated: February 4, 2013

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Vickie L. Feeman

VICKIE L. FEEMAN
Attorneys for Plaintiffs
SYNOPSIS, INC., EMULATION
VERIFICATION ENGINEERING S.A.
AND EVE-USA, INC.

Dated: February 4, 2013

O'MELVENY & MEYERS LLP

By: /s/ Elizabeth Offen-Brown

ELIZABETH OFFEN-BROWN
Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

Pursuant to Civil Local Rule 5-1(i)(3), counsel for Plaintiffs has obtained the concurrence of Mentor Graphics Corporation's counsel in the filing of this Stipulated Request.

Dated: February 4, 2013


ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Vickie L. Feeman

VICKIE L. FEEMAN
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SYNOPSIS, INC., EMULATION
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AND EVE-USA, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 7, 2013


Honorable Maxine M. Chesney
United States District Judge

¹ Paragraphs 7 and 7 of Plaintiffs' Answer correspond to paragraphs 7 and 7 of Counts II and III of Mentor's Counterclaims.